

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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LAUREN LOCKWOOD,

Plaintiff,

: Index No.: 514650/2018

-against-

CBS RADIO INC., CBS SPORTS RADIO,
ENTERCOM COMMUNICATIONS
CORP., JOSEPH BENIGNO, SEAN
ARGAMAN, MARK ZUKERMAN, ABC
CORPORATIONS and JOHN DOES 1-10,

Defendants.

: AFFIDAVIT OF
: JACQUELYN MUSIELLO

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Jacquelyn Musiello, under oath, certifies as follows:

1. I am over 18 years of age and reside in 161 Hillside Lane, Saylorsburg

Pennsylvania. I submit this Affidavit for the court's consideration.

2. I was employed by CBS Radio Inc. and CBS Sports Radio ("CBS Radio"), as a Human Resources ("HR") Manager and Payroll Specialist from 2012 to February 2017. My office at CBS Radio was located at 345 Hudson Street, New York, New York. As an employee of CBS Radio, I was required to follow CBS Corporation policies.

3. As an HR Manager, I was required to administer CBS Corporation's human resources policies and assist CBS Radio employees in accordance with CBS Corporation policies and Business Code of Conduct. In 2017, there were approximately 500 employees employed by CBS Radio. At most, there were two HR employees for CBS Radio employees, (myself and my supervisor) to support 500 employees.

4. Although I did not receive formal training to perform my HR manager duties, I relied on CBS Corporation's policies, procedures, and Business Codes of conduct to do my job.

5. Any critical questions or important decision making I had were referred or sent by email (by myself or my supervisor) up to CBS Executive Management, VP HR or In House Legal Counsel. Most of CBS Radio Executives reported to CBS Corporation Executives on up to Les Moonves, CEO of CBS Corporation, while I was employed. CBS Radio employees regularly received email communications, updates on policies and benefits from CBS "Corporate" as it was known or referred to as and some had "CBS.com" emails as well as "CBSRADIO.com".

6. My immediate supervisor was HR Director, Margaret Marion. Ms. Marion reported directly to Mark Zulli, who was VP HR at CBS Radio and VP HR CBS Local Digital Media Corporation, who then reported up to CBS Corporation's EVP HR.

7. During my employment, I witnessed my supervisor, Ms. Marion have regular contact by phone, email or in person to consult and obtain guidance and/or approval by Mr. Zulli regarding CBS Corporation policies and decisions that directly affected CBS Radio employees. Mr. Zulli is just one example of how CBS VP roles would overlap between CBS Corporation's companies, who were all treated as employees of "CBS family" as referred to in CBS' policies.

8. More specifically, my HR duties were to maintain employment, payroll and benefit records of employees, meet with employees to discuss any internal issues that arose during their employment, counsel them, answer questions about CBS corporate policies and procedures, respond to applications for benefits and medical and disability leave, investigate employee complaints and conduct exit interviews. In addition, I calculated payroll and commissions for CBS Radio employees.

9. While I was employed, CBS Radio and CBS Corporation had integrated software through Oracle Database Management System, and integrated internal communication and payroll systems. The systems allowed CBS Corporation to access view, monitor and/or adjust the payroll records for CBS Radio. All employment, payroll and benefits systems were subject to approval by CBS Corporation's HR or Executive Management. At month end, we reconciled our books with CBS Corporation's Finance department. My controller was Randall Friend who reported directly to Stacey Benson, CBS Corporation SVP Finance.

10. In 2016, during a CBS company event, payroll checks that were required to be distributed to employees at the event were lost or misplaced. As HR Manager, I reported them missing. Before they could be voided, some of the payroll checks were cashed. CBS Corporation Finance Department was informed of this issue so that it could be handled internally and reissued to the employees whose checks were cashed. This is another example of how CBS Corporate would be involved in our payroll system and employee decision making.

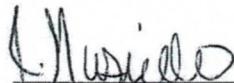
11. Another example of CBS Corporate Executive Management overlap and straddling was Scott Herman, a long term CBS employee who became CBS Radio's Chief Operations Officer in 2015. As COO, Mr. Herman led various CBS markets that overlapped radio, digital and television. His office was at CBS Corporate Headquarters on 52nd Street, New York, New York. On various occasions, I was required to and did request Mr. Herman's permission to approve certain payroll, overtime commissions, or benefits for CBS Radio employees.

12. As HR manager, it was known to me that CBS Corporation had the right to hire, layoff and/or fire any CBS Radio employee and, in fact, were involved in decision making to terminate CBS Radio employees as part of approved layoffs, performance and/or termination policies, particularly leading up to merger talks with Entercom in late 2016 to early 2017. CBS announced the Merger in February 2017 and layoffs had already started in 2015 and continued in 2016 and 2017.

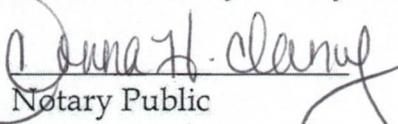
13. In 2016, I recall receiving CBS Corporation internal emails regarding newly implanted CBS policies and guidelines for internships that were employed by all CBS companies, following discussion in the media and CBS management about the legality of unpaid internships for for-profit employers in New York State.

14. Although my salary was paid by CBS Radio, in 2015, I received a stock letter award in lieu of an increase in compensation for excellent performance, called a 'Share the Vision Award" which was signed by Les Moonves, CEO of CBS Corporation.

15. I hereby certify that the foregoing statements made by me are true, and that if they are willfully false I am subject to punishment.


Jacquelyn Musiello

Subscribed and sworn before me
On this 21st day of May, 2019.


Donna H. Clancy
Notary Public

DONNA H. CLANCY
Notary Public State of New York
No. 02CL5056600
Qualified in Kings County
Commission Expires March 4 2028